



February 26, 2015
Via ECFS

**REDACTED –
FOR PUBLIC INSPECTION**

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**RE: NetFortris Acquisition Co. Inc.
FRN 0022976716
Special Access Data Collection
WC Docket No. 05-25, RM10593**

Dear Ms. Dortch,

Attached are the public versions of the essay responses for the above referenced Special Access Data Collection proceedings, submitted on behalf of NetFortris Acquisition Co. Inc ("Company") and in accordance with *Order and Data Collection Protection Order*, DA 14-1424, adopted October 1, 2014.

The Company's responses have also been submitted via the Special Access Web Portal.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Carey Roesel

Carey Roesel
Consultant to NetFortris Acquisition Co. Inc.

cc: Bryan Koehler - NetFortris
file: NetFortris - FCC
tms: FCx1501

CERTIFICATION

I have examined the responses and certify that, to the best of my knowledge, all statements of fact, data, and information contained therein are true and correct.

Signature: /s/ Bryan Koehler

Printed Name: Bryan Koehler

Title: Chief Financial Officer

Date: February 26, 2015

HIGHLY CONFIDENTIAL INFORMATION –
SUBJECT TO PROTECTIVE ORDERS IN WC DOCKET NO. 05-25
BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

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Special Access Data Collection
WC Docket No. 05-25 and RM-10593
Response of NetFortris Acquisition Co., Inc.
Question II.A.5

Question: Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an IRU agreement that constitute your network, including the fiber Connections to Locations. In addition, include the locations of all Nodes used to interconnect with third party networks, and the year that each Node went live.

Response:



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Response of NetFortris Acquisition Co., Inc.
Question II.A.8.a

Question: Describe the business rules and other factors that determine where you build your Connections. Examples of such rules/factors are minimum Term Commitments or minimum capacity commitments by the buyer; maximum build distances from the building to your core network; and/or number of competitors in the area. Include, also, any factors that would prevent you from building a Connection to an otherwise suitable Location. These could be factors that are under your control or those that are not.

Response:



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Question II.A.8.b.

Question: Explain how, if at all, business density is incorporated into your business rule, and if so, how you measure business density.

Response:



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Question II.A.8.c.

Question: In areas where your business rule has been most successful, explain why. Provide examples of geographic regions (if any) where you generally were or are able to successfully deploy Connections, and where you generally have experienced or currently experience serious difficulties in deploying Connections, and, if you are able to provide examples of both kind of regions, indicate what distinguishes these different regions.

Response:



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Response of NetFortris Acquisition Co., Inc.
Question II.A.10.

Question: Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:



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Question II.A.18.

Question: If you offer Dedicated Services pursuant to an agreement or Tariff that contains either a Prior Purchase-Based Commitment or a Non-Rate Benefit, then explain how, if at all, those sales are distinguishable from similarly structured ILEC sales of DS1s, DS3s, and/or PBDS.

Response:



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Question II.A.19.

Question: Provide the business justification for the Term or Volume Commitments associated with any Tariff or agreement you offer or have in effect with a customer for the sale of Dedicated Services.

Response:



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Response of [Company Name]
Question II.D.1.

Question: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: NetFortris is a leader in cloud-based voice and data networking services. Meeting the demand for an integrated, cloud-based platform to manage voice, data, applications and devices, NetFortris delivers flexible and secure services to multi-site retail, healthcare and financial services organizations, as well as multi-location enterprises, across the nation. The NetFortris Cloud Communications Platform provides the foundation for technology innovation and integration of services. These services are developed and brought to market quicker than services built in traditional development environments, allowing innovation to reach customers at greater speeds and at better price points

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Response of NetFortris Acquisition Co., Inc.
Question II.D.2.**

Question: Identify where your company's policies are recorded on the following Dedicated Service-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response:



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Question II.F.11.

Question: For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing End-User Channel Terminations from one Provider of Dedicated Services to another.

Response:

